

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

TELEFONAKTIEBOLAGET LM  
ERICSSON AND ERICSSON INC.,

Plaintiffs,

v.

APPLE, INC.,

Defendant.

Civil Action No. 2:21-cv-00376-JRG

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APPLE INC.,

Counterclaim-Plaintiff,

v.

TELEFONAKTIEBOLAGET LM  
ERICSSON AND ERICSSON INC.,

Counterclaim-Defendants.

**JOINT NOTICE REGARDING ERICSSON’S MOTION TO COMPEL  
APPLE TO PRESENT A CORPORATE REPRESENTATIVE  
TO TESTIFY ON RELEVANT TOPICS**

Pursuant to the Court’s July 22, 2022 Order (Dkt. 137), Plaintiffs Telefonaktiebolaget LM Ericsson and Ericsson Inc. (“Ericsson”) and Defendant Apple Inc. (“Apple”) conducted a lead and local meet and confer on July 28, 2022, and have continued conferring in a good-faith attempt to further narrow the dispute, including through the further designation of witnesses on the topics identified in Ericsson’s Motion to Compel Apple to Present a Corporate Representative, or through the elimination of certain scope objections to various topics for which Apple had previously provided partial designations. Notwithstanding the parties’ efforts, they remain at impasse on the following topic from Ericsson’s May 13, 2022 Third Notice of Deposition to Apple:

**Ericsson Topic 50:** “Business agreements or ventures that Apple has entered into related to the 2G, 3G, 4G, or 5G standard, or any Apple product capable of utilizing those standards including, but not limited to, deals or agreements with Foxconn, Wistron, Pegatron, and Qualcomm.”

***Apple’s Designation on Topic 50: None.***

Dated: August 3, 2022

Respectfully Submitted,

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***Attorneys for Defendant and  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document has been served on all counsel of record via the Court's ECF system on August 3, 2022.

/s/ Andy Tuck  
Andy Tuck